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Attorneys for Defendants
DEUTSCHE ASSET MANAGEMENT,
DEUTSCHE BANK AG, DEUTSCHE
INVESTMENT MANAGEMENT AMERICAS, INC.
SCUDDER DISTRIBUTORS, INC.

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

LAWRENCE ROMANECK,

Plaintiff,

v.

Case No. C 05 02473 TEH

**STIPULATION AND ORDER TO
EXTEND CERTAIN LITIGATION
DEADLINES**

DEUTSCHE ASSET MANAGEMENT, a
Delaware corporation, DEUTSCHE BANK
AG, a New York corporation, DEUTSCHE
INVESTMENT MANAGEMENT
AMERICAS, INC., a corporation, SCUDDER
DISTRIBUTORS, INC. a corporation,
INDIVIDUAL DOES I-XV and CORPORATE
DOES XVI – XXV, inclusive

Defendants.

1 IT IS HEREBY STIPULATED between the parties, through their respective counsel of
2 record, and subject to the approval of this Court, that:

3 WHEREAS, Defendants filed their Motion for Summary Judgment on June 19, 2006, for
4 hearing on July 24, 2006;

5 WHEREAS, the parties have assessed and discussed settlement prospects during the
6 course of this litigation and continue to do so;

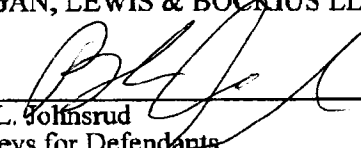
7 WHEREAS, so that the parties may continue to assess and discuss settlement prospects
8 and avoid expending potentially unnecessary judicial and party resources, the parties stipulate
9 to continue the hearing on Defendants' Motion for Summary Judgment to ^{August 14, 2006} ~~July 31, 2006~~, at ^{TEH}
10 10:00 a.m., which means that Plaintiff shall have until July 10, 2006, to file an Opposition to
11 Defendants' Motion and that Defendants shall have until July 17, 2006, to file a reply;

12 WHEREAS, the parties further stipulate to continue the last day to compel fact discovery
13 by one week, to July 5, 2006; and, therefore,

14 GOOD CAUSE EXISTS to continue the litigation deadlines set forth herein so that the
15 parties can further assess settlement prospects, avoid the use of potentially unnecessary judicial
16 and party resources, and because no other litigation deadlines will be prejudiced by the short
17 continuances described herein.

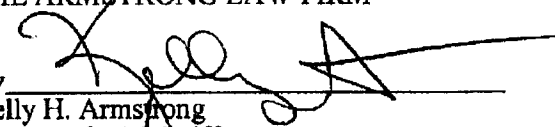
18 Dated: June 27, 2006

MORGAN, LEWIS & BOCKIUS LLP

19 By 
20 Brian L. Johnsrud
Attorneys for Defendants.

21 Dated: June 27, 2006

THE ARMSTRONG LAW FIRM

22 By 
23 Kelly H. Armstrong
24 Attorney for Plaintiff
Lawrence Romanek

25 Dated: June __, 2006

THE BRADY LAW GROUP

26 By _____
27 Steven J. Brady
28 Attorney for Plaintiff
Lawrence Romanek

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4 hearing on July 24, 2006;

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6 course of this litigation and continue to do so;

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8 and avoid expending potentially unnecessary judicial and party resources, the parties stipulate
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12 WHEREAS, the parties further stipulate to continue the last day to compel fact discovery
13 by one week, to July 5, 2006; and, therefore,

14 GOOD CAUSE EXISTS to continue the litigation deadlines set forth herein so that the
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18 Dated: June __, 2006

MORGAN, LEWIS & BOCKIUS LLP

19 By _____
20 Brian L. Johnsrud
21 Attorneys for Defendants.

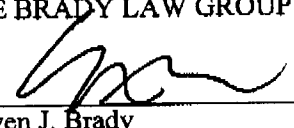
22 Dated: June __, 2006

THE ARMSTRONG LAW FIRM

23 By _____
24 Kelly H. Armstrong
25 Attorney for Plaintiff
26 Lawrence Romanek

27 Dated: June 27, 2006

THE BRADY LAW GROUP

28 By 
Steven J. Brady
Attorney for Plaintiff
Lawrence Romanek

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ORDER

The Court, having considered the Stipulation of Plaintiff and Defendants, approves said Stipulation per the terms contained therein.

IT IS SO ORDERED.

s/Thelton Henderson

6/29/06

Dated: _____

JUDGE OF THE UNITED STATES DISTRICT COURT